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RULES CLEARINGHOUSE

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CLEARINGHOUSE RULE 95-066

Comments

[NOTE: All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Revisor of Statutes Bureau and the Legislative Council Staff, dated October 1994.]

2. Form, Style and Placement in Administrative Code

a. Where the subunits of the rule are listed immediately following the treatment clause, the first subunit treated should be preceded by a full reference to the appropriate chapter, section number, etc. For example, in SECTION 1 of the rule, when sub. (6) is listed, it should be preceded by “Ph-Int 1.02”. Similarly, in SECTION 2, the reference to par. (a) should be preceded by “Ph-Int 1.03 (2)”. All rule SECTIONS should be reviewed and revised accordingly.

b. In various parts of the rule, acronyms, abbreviations or terms in quotations are used. Acronyms and abbreviations should be used only to improve readability and, if used, they must first be defined and used consistently. Examples of the use of acronyms or abbreviations include the use of “Pharm.D.” in parentheses following the term “Doctor of Pharmacy”; the use of the term “Internship-for-Credit” in quotations which indicates that this term should be defined; and the use of the term “C.E.U.” without a prior definition. [See s. 1.01 (8), Manual.] Also, parenthetical material should be avoided in drafting rules. [See s. 1.01 (6), Manual.]

c. The entire rule should be written in the active voice. [See s. 1.01 (1), Manual.] For example, in s. Ph-Int 1.06 (4) (d), the second sentence should begin with “The pharmacy internship board shall develop and make available....” The third sentence should begin with “The sponsoring institution, association or agency shall provide....” Also, what is the unit schedule referred to in the second sentence? Is this part of a rule? [See ss. 227.10 (1) and 227.01 (13), Stats.]

d. Instead of repealing and recreating the entire s. Ph-Int 1.06 in SECTION 7 of the rule, the board should consider repealing and recreating s. Ph-Int 1.06 (4), since this is the only

part of the section that is changed. The other subsections of the rule, if unamended, do not need to be included in the repeal and recreation.

e. In s. Ph-Int 1.06 (4), each of the paragraphs should end with a period rather than a semicolon. [See s. 1.03 (intro.), Manual.]

5. Clarity, Grammar, Punctuation and Use of Plain Language

a. There seem to be some inconsistencies between what is stated in the analysis to the rule and what is reflected in the current rule. For example, paragraph 3 of the analysis states that “a maximum of 500 hours of internship credit can be granted to students enrolled in either a Bachelor of Science degree in pharmacy or a Doctor of Pharmacy degree program.” Current s. Ph-Int 1.03 (2) (a) appears to allow a maximum of 1,000 hours of internship credit to students enrolled in the Bachelor of Science or Doctor of Pharmacy degree program. This should be reviewed for accuracy.

Similarly, paragraph 5 of the analysis states that less than full-time internship experiences are currently not eligible for internship credit. However, current s. Ph-Int 1.03 (2) (g) appears to permit internship credit for less than full-time experiences concurrent with academic registration in a Doctor of Pharmacy degree program. The analysis should be compared with the current rule to correct this discrepancy.

b. A period should be inserted after the reference to SECTION 6 in the rule.

c. It is not clear what is meant by “except at the discretion of the pharmacy internship board” in s. Ph-Int 1.06 (4) (b). May the board increase or decrease the six months of practice required? May the board eliminate the requirement? What standards will the board use in making a determination?

d. The commas after the words “professional” and “personal” in s. Ph-Int 1.06 (4) (f) should be deleted.

e. In s. Ph-Int 1.06 (5), the comma after the word “practice” in the first line should be changed to a period. A new sentence should start with “A preceptor” on this line.